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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

RICHARD KADREY, et al.,

Individual and Representative Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

CASE NO. 3:23-cv-03417-VC

**DECLARATION OF MAXWELL V. PRITT
IN SUPPORT OF PLAINTIFFS' MOTION
TO CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED**

I, Maxwell V. Pritt, declare as follows:

1. I am an attorney duly licensed to practice in the State of California. I am a partner in the San Francisco, California office of Boies Schiller Flexner, LLP (“BSF”), counsel for Plaintiffs in the above-captioned action. I have personal knowledge of the matters stated herein and if called upon, I can competently testify thereto. I make this declaration pursuant to 28 U.S.C. Section 1746 and Local Rule 6-3 in support of Plaintiffs’ Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed (the “Motion to Consider”).

2. The Motion to Consider is filed in connection with Plaintiffs’ Motion for Relief From Non-Dispositive Pretrial Order.

3. The Motion for Relief contains, in various places, summaries or descriptions of material that Defendant Meta Platforms, Inc., has designated as “Highly Confidential – Attorneys’ Eyes Only” (“AEO”) as defined in the in the parties’ Stipulated Protective Order for Litigation Involving Patents, Highly Sensitive Confidential Information and/or Trade Secrets (ECF No. 90, the “Protective Order”). Plaintiffs are filing under seal numerous exhibits in support of the Motion for Relief that contain information designated by Meta as “Highly Confidential – AEO.”

4. Plaintiffs assert no confidentiality of their own over any of these documents. Nevertheless, Plaintiffs are filing the following documents temporarily under seal due to Meta’s Protected Material designations.

Documents Sought to be Sealed	Portions to be Filed Under Seal	Basis for Sealing Portion of Document
Motion for Relief	Highlighted	Refers to Material Designated by Meta as “Highly Confidential - AEO” That Has Not Yet Been Publicly Filed
Appendix A	Full Document	Refers to Material Designated by Meta as “Highly Confidential - AEO”
Appendix B	Full Document	Refers to Material Designated by Meta as “Highly Confidential – AEO”
Pritt Decl. Ex. A	Full Document	Designated by Meta as “Highly Confidential – AEO”

Pritt Decl. Ex. B	Excerpts Redacted By Meta, Dkt. 391	Designated by Meta as “Highly Confidential - AEO”
Pritt Decl. Ex. C	Full Document	Designated by Meta as “Highly Confidential - AEO”
Pritt Decl. Ex. D	Excerpts Redacted By Meta, Dkt. 391	Designated by Meta as “Highly Confidential - AEO”
Pritt Decl. Ex. F	Full Document	Designated by Meta as “Highly Confidential - AEO”
Pritt Decl. Ex. G	Excerpts Redacted By Meta, Dkt. 391	Designated by Meta as “Highly Confidential - AEO”
Pritt Decl. Ex. H	Full Document	Designated by Meta as “Highly Confidential - AEO”
Pritt Decl. Ex. I	Full Document	Designated by Meta as “Highly Confidential - AEO”
Pritt Decl. Ex. J	Full Document	Designated by Meta as “Highly Confidential - AEO”
Pritt Decl. Ex. K	Full Document	Designated by Meta as “Highly Confidential - AEO”
Pritt Decl. Ex. L	Full Document	Designated by Meta as “Highly Confidential - AEO”
Pritt Decl. Ex. M	Full Document	Designated by Meta as “Highly Confidential - AEO”
Pritt Decl. Ex. N	Full Document	Designated by Meta as “Highly Confidential - AEO”
Pritt Decl. Ex. O	Full Document	Designated by Meta as “Highly Confidential - AEO”
Pritt Decl. Ex. P	Full Document	Designated by Meta as “Highly Confidential - AEO”
Pritt Decl. Ex. Q	Full Document	Designated by Meta as “Highly Confidential - AEO”
Pritt Decl. Ex. R	Full Document	Designated by Meta as “Highly Confidential - AEO”

I declare under penalty of perjury that the foregoing is true and correct. Executed
this 15th day of January 2025 in San Francisco, California.

By: /s/ Maxwell V. Pritt
Maxwell V. Pritt